

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS, DEL RIO DIVISION

United States of America

vs.

(1) Brittany Nisha Turney

§
§
§
§
§

CRIMINAL COMPLAINT

CASE NUMBER: DR:21-M -01513(1)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about **August 25, 2021** in **Dimmit** county, in the **WESTERN DISTRICT OF TEXAS** defendant(s) did, conspire with and other unnamed co-conspirators, to transport, or move or attempt to transport or move, certain persons, knowing or in reckless disregard of the fact that that such persons were aliens illegally present in the United States, a felony,

in violation of Title **8** United States Code, Section(s) **1324(a)(1)(A)(v)(I)**

I further state that I am a(n) **Border Patrol Agent** and that this complaint is based on the following facts: *"On August 25, 2021, defendants Wesley Groomes and Brittany Turney, both U.S. citizens, were arrested near Carrizo Springs, TX for transporting illegal aliens and conspiracy to transport aliens respectively, in furtherance into the U.S. GROOMES (driver) and TURNEY (front passenger) were encountered during primary inspection at the Border Patrol Checkpoint on Hwy 277 driving a gray 2018 Nissan Versa. Upon questioning*

Continued on the attached sheet and made a part of hereof.

Sworn to before me and subscribed in my presence,



Signature of Complainant
Pena, Luis A
Border Patrol Agent

08/31/2021

File Date

at DEL RIO, Texas

City and State

VICTOR ROBERTO GARCIA

UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

WESTERN DISTRICT OF TEXAS

UNITED STATES OF AMERICA

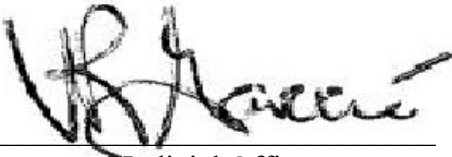
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Continuation of Statement of Facts:

of the vehicle's occupants' agents determined defendants were transporting four illegal aliens, two of which were seating on the floorboards, who admitted being illegally in the U.S. TURNEY admitted conspiring with Robert Castro (passenger) to go on a trip to Eagle Pass, TX and get paid for it. TURNEY further stated once they arrived at a residence, several people got into her car and started driving south on Hwy 277. GROOMES did not provide statements."



Signature of Judicial Officer



Signature of Complainant